

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**CHRISTOPHER LEE SCHWENK,
Individually, and on Behalf of All
Others Similarly Situated,**

PLAINTIFF

v.

JOSEPH GARCIA,

**CORRECTIONS SPECIAL
APPLICATION UNIT, LLC,**

**YORK COUNTY, PENNSYLVANIA
d/b/a YORK COUNTY PRISON,**

JULIE WHEELER,

DOUG HOKE,

RON SMITH,

ADAM OGLE,

CLAIR DOLL,

**and JOHN DOE and JANE DOE,
CORRECTION OFFICERS,**

DEFENDANTS

C.A. No. 1:21-CV-2079

JURY TRIAL DEMANDED

Electronically Filed Document

**PRAECIPE TO ENTER DEFAULT AGAINST DEFEDANTS
JOSEPH GARCIA AND CORRECTIONS SPECIAL
APPLICATION UNIT, LLC**

TO THE CLERK OF COURT:

Pursuant to Federal Rule of Civil Procedure 55, please enter a Default against Defendants, Corrections Special Application Unit, LLC, and Joseph Garcia, for failure to defend, answer, or otherwise plead to the Complaint duly served and delivered on February 22, 2022, regarding the above-captioned matter.

Dated: July 18, 2022

Respectfully submitted,

/s/ Leticia C. Chavez-Freed

LETICIA C. CHAVEZ-FREED, ESQUIRE

Pennsylvania ID No. 323615

leticia@chavez-freedlaw.com

THE CHAVEZ-FREED LAW OFFICE

2600 North Third Street | Second Floor

Harrisburg, PA 17110

(717) 893-5698

/s/ Alan Denenberg

ALAN DENENBERG, ESQUIRE

Pennsylvania ID No. 54161

adenenberg@adlawfirm.com

ABRAMSON & DENENBERG, P.C.

1315 Walnut Street | Suite 500

Philadelphia, PA 19107

(215) 398-7066